

Socha, Julianne

From: Pierard.Kevin@epamail.epa.gov
Sent: Monday, June 06, 2011 9:20 AM
Subject: CAFO Tracker

Sanjay/Al Below are our comments on the 5-27-11 CAFO tracker submittal. These comments are extensive but, assuming you can get the CAFO tracker up to date, we dont expect our future comments to be this expansive.

The CAFO tracker included comments regarding actions and discussions with R5 enforcement. We sent a few questions to enforcement concerning these and are waiting for a response. The comments below should not be affected by any update we receive from enforcement. However, we may have some additional CAFO specific comments on permit applications not included below.

General Comments:

- Due date for subsequent monthly submittals needs to be agreed on between EPA and IEPA. We suggest monthly CAFO tracker reports be submitted no later than the 27th of each month.
- Since this is the first complete report provided by IEPA, dates in the "Expected Completeness Review Date" and "Expected Final Action Date" should not be past due. Some dates are past due by months/years. The June monthly report should update these columns for all CAFOs, except Rancho Cantera and Strout Crossing, to provide expected dates based on relevant factors. If expected dates are changed on reports after the June report use of strike out for any changed date will be necessary to highlight the change.
- EPA would expect permit activity month to month although not all of the activity would necessarily be reflected by dates added to the various columns. Use of the "Status Comments" and "Last Status Comments Update Date" columns are the columns that would be best used to provide current permit review activities. Although an update on all permits may not be appropriate every month at least some of the permits should have updated comments with each monthly report. See specific permit comments below for some situations where the comments suggest an update is needed.

Permit Specific Comments:

- IL0061611, Perkinson Porkville: Status Comments indicates FOS to inspect by 4/1/11. Date of inspection or notation that inspection was completed should be included in Status Comments.
- ILA010070, R3E Port, LLC: Status Comments indicates that NMP was reviewed and a revised NMP is needed. IEPA must specify the action taken to request/obtain a revised NMP.
- IL0078522, Mondt Dairy Farm: Status Comments indicates that a facility visit was planned for March and request for documents will be made at that time. Was facility visit conducted? Were additional documents requested/obtained? Was revised application submitted in Oct 2010 incomplete? Was the request for information made during the March visit to request information to complete the application?
- Pietker, Martha Trust, Dairy: Exemption 5 and Exemptions 7(A) and 7(E)
- IL0062529, Pork Chop Ridge: Using this item as an example, the Status Comments indicates that a 3rd NOI was issued however only one date appears in the NOI Date column. If multiple NOIs are issued, all dates should be entered into the NOI Date column. Additionally, for this permit

application, Exemption 5 and Exemptions 7(A) and 7(E) please include an update in the Status Comments column and strike out the entire row.

- ILA010083, Dare Farms- Canton: Status Comment indicates NMP review by 5/1/11. The June report submitted to EPA should include an update or appropriate action based upon completion of this review.
- ILA010059, Malone, Ed cattle Farm: Exemption 5 and Exemptions 7(A) and 7(E) If discussions have not been held prior to submittal of the June report, EPA would appreciate if the status comment column could include a target date for these discussions.
- ILA0100020 and ILA010082, SF Ventures: Is this the same owner, two facilities or same owner, one facility located in two counties? Status Comments indicates NMP review by 5/1/11. The June report submitted to EPA should include an update or appropriate action based upon completion of this review.
- IL0076503, Highlands LLC: Status Comments indicates NMP review by 5/1/11. The June report submitted to EPA should include an update or appropriate action based upon completion of this review.
- ILA010078, Car-Mer Farms: Has a revised application been received? The Application Revision Received Date column indicates a received date of 8-13-11. Please clarify.
- ILA010019, Doubletree Farms: What action is planned 30 day due date in NOI not being met?
- ILA010060, High Power Pork, LLC: Status Comments indicates NMP received and under review by 3-3-11. The June report submitted to EPA should include an update or appropriate action based upon completion of this review.

Please address these comments with the next submittal by June 27. If you would like to discuss any of these comments please let me, Steve, or Julianne know. thanks